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April 11, 2023

VIA ECF

The Honorable Alvin K. Hellerstein
Senior United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.

/s/ Alvin Hellerstein
U.S.D.J.
April 11, 2023

**Re: *United States v. Shangzhen Wu*
23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

Please recall that I represent Mr. Shangzhen Wu in his defense of the above-referenced matter. I write on behalf of the parties to respectfully request that Your Honor grant a modification of the personal recognizance bond previously set on March 2, 2023, to raise the amount of the bond to \$100,000.00.

On March 2, 2023, Mr. Wu was arraigned before United States Magistrate Judge Gabriel W. Gorenstein. Judge Gorenstein set conditions of release on a \$50,000.00 personal recognizance bond to be co-signed by two financially responsible persons and secured by \$5,000.00 cash. Judge Gorenstein also set the following conditions of release: supervision by United States Pretrial Services ("Pretrial") as directed; surrender all travel documents and no new applications for travel documents; travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey; home incarceration; location monitoring as directed by Pretrial; and no contact with witnesses or alleged victims. Judge Gorenstein further ordered that Mr. Wu cannot possess the identifying information of others or open any new bank accounts, and if Mr. Wu is released, he is to reside at his residence in Jersey City, New Jersey. Mr. Wu is to be detained until all conditions are met.

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The parties have conferred about potential co-signers to satisfy the bond requirements, and the Government has advised that the defense's proposed co-signers are acceptable to the extent that Mr. Wu's bond amount is raised to \$100,000.00. The defense has no objection to such a modification. Therefore, the parties mutually and respectfully request that Your Honor enter an Order raising the amount of the personal recognizance bond to \$100,000.00. All other bond conditions ordered by Judge Gorenstein are to remain in place. Thank you for your consideration of this request.

Respectfully submitted,


Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Jerry Fang
Mr. Shangzhen Wu